



**Freshfields Bruckhaus Deringer US LLP**

**Via ECF**

The Honorable P. Kevin Castel  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, NY 10007-1312

**Silicon Valley**  
855 Main Street  
Redwood City, CA 94063  
T +1 650 618 9250 (Switchboard)  
+1 650 461 8276 (Direct)  
E justina.sessions@freshfields.com  
www.freshfields.com

July 10, 2024

**Re: *In re Google Digital Advertising Antitrust Litigation*, 21-md-03010 (PKC)**

Dear Judge Castel:

I write on behalf of Defendants Google LLC, Alphabet Inc., and YouTube, LLC (together, “Google”) to respectfully seek permission from the Court to allow Google to designate two witnesses to testify on Inform-specific 30(b)(6) Topics 17 and 18 on or before July 26, 2024. Inform does not oppose this request. No conference is currently scheduled.

Inform-specific 30(b)(6) Topics 17 and 18 are quite broad and cover several distinct Google products and features. Google has experienced some difficulty finding and educating personnel to testify as to these Topics. Google and Inform agree that a minor modification of Pre-Trial Order No. 15 (“PTO 15”),<sup>1</sup> permitting Google to designate two witnesses to sit for no more than a cumulative 5 hours of testimony, would benefit both parties. The parties further agree that the depositions of these witnesses would occur on or before July 26, 2024, and that both witnesses will be produced on the same day. All other depositions contemplated by PTO 15 are occurring on or before July 12, 2024.

The parties additionally agree that these depositions will be treated as if they were taken during the fact discovery period. The relief requested herein, which is unopposed, will not affect any other deadlines in this case.

---

<sup>1</sup> Pre-Trial Order No. 15 ordered “Google to designate one witness to sit for no more than four hours in response to Topics 17 and 18.” ECF No. 843.

Google therefore respectfully requests that the Court modify PTO 15 to permit Google to designate up to two witnesses to testify on Topics 17 and 18 for 5 hours cumulatively, and that such depositions shall occur no later than July 26, 2024.

Sincerely,

/s/ Justina K. Sessions

Justina K. Sessions  
FRESHFIELDS BRUCKHAUS  
DERINGER US LLP  
855 Main Street  
Redwood City, CA 94063  
Telephone: (650) 618-9250  
Email: justina.sessions@freshfields.com

*Counsel for Defendants Google LLC,  
Alphabet Inc., and YouTube, LLC*

CC: All Counsel of Record (via ECF)